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Attorney for Defendant
ALLSTON TAYLOR

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Case No. Cr. S-99-424 WBS
)	
Plaintiff,)	STIPULATION AND ORDER
)	FOR EARLY TERMINATION
)	OF SUPERVISED RELEASED
v.)	RE: ALLSTON TAYLOR
)	
ALLSTON TAYLOR,)	
)	
Defendant.)	

The United States of America, through Assistant U.S. Attorney Mary L. Grad; defendant Allston Taylor, through his counsel Scott L. Tedmon; and United States Probation, through U.S. Probation Officer Rana Riner, hereby stipulate that defendant Allston Taylor's term of supervised release should be terminated forthwith. The parties present the Court with the following information supporting this stipulation and requested order.

I

FACTS SUPPORTING STIPULATION

On March 5, 2003, Mr. Taylor was sentenced by the Honorable William B. Shubb to a sentence of 24 months, to be served in a Bureau of Prisons facility. The Court ordered that upon Mr. Taylor's release from imprisonment, Taylor shall be on supervised release for a term of 60 months. Further, Mr. Taylor was ordered to pay an assessment of \$100.00, and a fine of \$2,500.00.

1 Mr. Taylor completed his 24 months of in-custody Bureau of Prisons confinement in April
2 of 2004. Mr. Taylor's 60-month term of supervised release commenced on April 22, 2004 and
3 concludes on April 21, 2009. Mr. Taylor has successfully completed 35 months of the 60 months
4 of supervised release ordered by the Court.

5 A review of U.S. Probation's general criteria for early termination reveals nine factors to be
6 considered. Upon review of the totality of these factors, the United States Attorney, United States
7 Probation and defense counsel concur that early termination of Allston Taylor's supervised release
8 is appropriate.

9 1. Stable Community Reintegration (e.g. residence, family, employment): Since his release
10 from confinement, Mr. Taylor has continuously resided in the Atlanta, Georgia area. Additionally,
11 Mr. Taylor has been continuously employed since his release from confinement. Mr. Taylor has
12 successfully reintegrated into the community since his release from confinement and has done so for
13 the past 35 months. In this regard, counsel for Mr. Taylor has spoken to his supervising probation
14 officer, Ms. Rana Riner. Ms. Riner confirmed Mr. Taylor's outstanding performance while on
15 supervised release and supports this motion for early termination.

16 2. Progressive Strides Towards Supervision Objectives and in Compliance With All
17 Conditions of Supervision: Mr. Taylor has complied with each and every condition of his supervised
18 release over the past 35 months. Further, Mr. Taylor has made the necessary progressive strides
19 towards supervision objectives during the past 35 months to the extent that U.S. Probation supports
20 an order from this Court granting early termination.

21 3. Aggravated Role in the Offense of Conviction: In the instant case, Mr. Taylor was
22 convicted of 21 U.S.C. §846, 841(a) - Conspiracy to distribute and possess with intent to distribute
23 more than 10 grams of LSD. Mr. Taylor was given a 2-level increase for role in the offense at the
24 time of sentencing. However, given Mr. Taylor's exemplary performance while on supervision,
25 Probation Officer Riner supports this motion and recommends early termination of supervised
26 release for Mr. Taylor.

27 4. No History of Violence: Mr. Taylor satisfies this criteria as he has no history of violence.
28

1 5. No Recent Arrests or Convictions (including unresolved pending charges), or Ongoing,
2 Uninterrupted Patterns of Criminal Conduct: During his 35 months of supervised release, Mr. Taylor
3 has had no arrests or convictions of any kind. Further, during his 35 months of supervised release,
4 Mr. Taylor has not been involved in any type of ongoing, uninterrupted patterns of criminal conduct.
5 As such, Mr. Taylor satisfies this criteria.

6 6. No Recent Evidence of Alcohol or Drug Abuse: Mr. Taylor satisfies this criteria as there
7 is no evidence of any alcohol or drug abuse. Since the Court's order, there is no evidence of any
8 substance abuse by Mr. Taylor and as such, he satisfies this criteria.

9 7. No Recent Psychiatric Episodes: Mr. Taylor satisfies this criteria as he has not had any
10 recent episodes of a psychiatric nature.

11 8. No Identifiable Risk to the Safety of Any Identifiable Victim: Mr. Taylor satisfies this
12 criteria as there is no information which would lead to the conclusion that Taylor presents an
13 identifiable risk to the safety of anyone, much less an identifiable victim.

14 9. No Identifiable Risk to Public Safety Based on the Risk Prediction Index (RPI): There is
15 no information which would lead to the conclusion that Mr. Taylor presents an identifiable risk to
16 public safety based on the Risk Prediction Index. In point of fact, Mr. Taylor presents no identifiable
17 risk to anyone in any manner and as such, Taylor satisfies this criteria.

18 As has been set forth above, Mr. Taylor meets each of probation's nine general criteria for
19 early termination. This Court has the statutory authority to terminate supervised release in felony
20 cases after the expiration of 12 months of supervision if warranted by the conduct of the defendant
21 and the interest of justice. Mr. Taylor has completed 35 months of supervised release, which is more
22 than half of the time ordered for supervision. As has been demonstrated previously, terminating
23 supervised release early is appropriate in this case and is supported by U.S. Probation Officer Riner.
24 Mr. Taylor has complied with the terms of his supervision and his overall progress in meeting
25 supervision objectives have been met. As such, Mr. Taylor respectfully requests his term of
26 supervised release be terminated early in the interest of justice.

II

CONCLUSION

Based on the foregoing, the United States Attorney, United States Probation and defense counsel stipulate and respectfully request this Court order that defendant Allston Taylor's 60-month term of supervised release be terminated early, effective forthwith, in the interest of justice.

IT IS SO STIPULATED.

DATED: March 7, 2007

McGREGOR W. SCOTT
United States Attorney

/s/ Mary L. Grad
MARY L. GRAD
Assistant U.S. Attorney

DATED: March 7, 2007

LAW OFFICES OF SCOTT L. TEDMON

/s/ Scott L. Tedmon
SCOTT L. TEDMON
Attorney for Defendant Allston Taylor

DATED: March 7, 2007

UNITED STATES PROBATION


/s/ Rana Riner
RANA RINER
Supervising U.S. Probation Officer

ORDER

___GOOD CAUSE APPEARING and based on the stipulation of the parties, together with the facts presented in support of the stipulation, IT IS HEREBY ORDERED that defendant Allston Taylor's previously imposed 60-month term of supervised release is terminated forthwith, in the interests of justice.

IT IS SO ORDERED.

Dated: March 8, 2007


WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE